

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

No. 5:09-CR-202-3D

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	<u>GOVERNMENT’S RESPONSE</u>
)	<u>TO PETITIONER’S MOTION</u>
)	<u>FOR SENTENCE REDUCTION</u>
DONNELL DEMETRIUS STANFORD,)	<u>PURSUANT TO 18 U.S.C. § 3582(c)</u>
)	
Defendant.)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby responds to the defendant’s motion for reduction of sentence pursuant to 18 U.S.C. § 3582 (c), and respectfully shows unto this Honorable Court as follows:

1) That the Government agrees with the United States Probation Office’s conclusion, as stated in the Resentencing Report, that the defendant is eligible for a reduction in sentence pursuant to United States Sentencing Guideline Amendment 782 (hereinafter “Amendment 782”) and Title 18, United States Code, Section 3582(c).

2) That the defendant’s original guideline range for Counts One and Three was three hundred twenty-four (324) to four hundred five (405) months.

3) That the defendant was sentenced to a term of imprisonment of three hundred sixty (360) months as to Counts One and Three.

4) That the Government agrees with the United States Probation Office that the newly established guideline range for Counts Ones and Three pursuant to Amendment 782, is two hundred sixty-two (262) to three hundred twenty-seven (327) months.

5) That, as a result of the application of Amendment 782 to the defendant's case, a comparable reduction in sentence within the newly established guideline range results in a two hundred ninety-one (291) months.

Respectfully submitted, this the 30th day of March, 2016.

JOHN STUART BRUCE
Acting United States Attorney

BY: /s/ Laura S. Howard
LAURA S. HOWARD
Assistant U.S. Attorney
310 New Bern Avenue, Suite 800
Raleigh, North Carolina 27601
Telephone: (919) 856-4530
Fax: (919) 856-4487
E-mail: laura.howard2@usdoj.gov
North Carolina Bar No. 38485

CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of March, 2016, served a copy of the foregoing upon the defendant in this action by electronic mail of the foregoing to:

G. ALAN DuBOIS
First Assistant Federal Public Defender
150 Fayetteville Street, Suite 450
Raleigh, North Carolina 27601
E-mail: Alan_DuBois@fd.org

JOHN STUART BRUCE
Acting United States Attorney

BY: /s/ Laura S. Howard
LAURA S. HOWARD
Assistant U.S. Attorney
310 New Bern Avenue, Suite 800
Raleigh, North Carolina 27601
Telephone: (919) 856-4530
Fax: (919) 856-4487
E-mail: laura.howard2@usdoj.gov
North Carolina Bar No. 38485